

EPA Comments for Proposed Title V Permit Renewal Evaluation for West Kern Water District Projects:

- **Facility ID S-353, Project # S-1072124**
- **Facility ID S-350, Project # S-1092709**
- **Facility ID S-349, Project # S-1092710**

Comment 1

Each of these permits includes at least one engine that is subject to NO_x emission limits and use a control device: non-selective catalytic reduction (NSCR). Yet the District's evaluations do not address CAM applicability. EPA expects permitting authorities to address CAM applicability in every evaluation for a title V permit renewal. Therefore, for engines that use NSCR to control NO_x emissions, the District must do a CAM applicability analysis, beginning with calculating the pre-control NO_x potential to emit of the each engine and comparing it to the title V major source threshold of 10 tons per year (for NO_x and VOC). If CAM applies to any of these NSCR controlled units, the District must add conditions to the final permit that satisfy the Part 64 monitoring design criteria, or include compliance schedules in the final permits that require the sources to submit CAM plans by a specified date. Note that under the latter scenario, the District would have to re-open the title V permits to add the CAM requirements. Please revise the evaluation for each of these engines to include a CAM applicability determination and add CAM requirements if required.